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May 16, 2024

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED

A handwritten signature in black ink that reads 'Katharine H. Parker'.

5/17/2024

Hon. Katharine H. Parker, U.S.M.J.

Re: Averbach et al. v. Cairo Amman Bank, Index No. 19-cv-00004

Dear Judge Parker,

As discussed at the status conference on May 1, 2024, we are writing on behalf of both parties to provide this Court with the parties' proposed modifications to this Court's January 29, 2024 Scheduling Order (ECF No. 244), regarding the deadlines for expert discovery as to liability.

The parties propose the Court adopt the following schedule:

- **Monday, July 1, 2024**: Deadline for Plaintiffs to serve their expert report(s) as to liability.
- **Thursday, August 15, 2024**: Deadline for CAB to serve its expert report(s) as to liability, including rebuttal testimony and affirmative testimony, if any.
- **Friday, August 30, 2024**: Deadline for Plaintiffs to serve any reply or rebuttal expert report(s) responding to CAB's expert report(s).
- **Monday, September 16, 2024**: Deadline for CAB to serve any reply expert report(s) responding to any rebuttal expert reports by Plaintiffs.
- **Thursday, October 31, 2024**: Deadline for the parties to complete expert depositions.

Plaintiffs' counsel has authorized us to submit the proposal on behalf of both parties.

Respectfully submitted,

/s/ Samantha Chaifetz

Samantha Chaifetz

Cc: All Counsel of Record (via ECF)